

# Sadowski Fischer PLLC

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September 22, 2015

The Honorable Margo K. Brodie  
225 Cadman Plaza East  
Brooklyn, New York 11201  
Courtroom: 6F  
Chambers: N 626

Re: *United States and New York ex rel. Lee, Luckie, and Gonzalez v. Northern Adult Daily Health Care Center and Deverman*, Civ. No. CV 13-4933 (MKB)

Dear Judge Brodie:

We represent the Plaintiffs/Relators in the above-captioned matter. Attached please find:

1. Plaintiffs/Relators' Notice of Motion; *Courtesy Copy – Original was electronically filed and assigned document number 35*;
2. Plaintiffs/Relators' Memorandum of Law in Support of Motion for Alternate Remedies; *Courtesy Copy – Original was electronically filed and assigned document number 36*;
3. Declaration of Robert W. Sadowski in Support of Motion for Alternate Remedies; *Courtesy Copy – Original was electronically filed and assigned document number 37*;
4. Exhibit A to the Declaration of Robert W. Sadowski, Relators' Complaint dated September 4, 2013;
5. Exhibit B to the Declaration of Robert W. Sadowski, the Press Release for the Non-Prosecution Agreement Defendant Northern Adult Daily Health Care Center and the New York Attorney General's Medicaid Fraud Control Unit, dated August 12, 2014;
6. Exhibit C to the Declaration of Robert W. Sadowski, the Non-Prosecution Agreement between Defendant Northern Adult Daily Health Care Center and the New York Attorney General's Medicaid Fraud Control Unit, dated June 26, 2014;
7. Exhibit D to the Declaration of Robert W. Sadowski, Relators' Amended Complaint, dated June 25, 2015;
8. Affirmation of Service, dated July 27, 2015; *Courtesy Copy – Original was electronically filed and assigned document number 38*;
9. Letter response from Jill D. Brenner, Special Assistant Attorney General, Medicaid Fraud Control Unit, dated August 7, 2015.

Regards,



Michael J. DeRienzo

Enc.

CC

Magistrate Judge James Orenstein  
225 Cadman Plaza East  
Brooklyn, New York 11201  
Courtroom: 11D South  
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